

Hearing Date: July 24, 2012 at 10:00 a.m. (ET)
Objection Deadline Date: July 17, 2012 at 4:00 p.m. (ET)

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Bankruptcy Counsel for Plaintiffs

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
: **Chapter 11**
Residential Capital, LLC, et al., :
: **Case No. 12-12020 (MG)**
Debtors. :
: **Jointly Administered**
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**MOTION OF DEBORAH BOLLINGER AND BRYAN BUBNICK FOR RELIEF FROM
AUTOMATIC STAY AS TO GMAC MORTGAGE, LLC AND RESIDENTIAL
CAPITAL, LLC**

Movants Deborah Bollinger and Bryan Bubnick hereby move for relief from the automatic stay as to debtors Residential Capital, LLC and GMAC Mortgage, LLC pursuant to 11 U.S.C. § 362 in order to proceed to trial and liquidate their claims, and the claims of the opt-in Plaintiffs, for unpaid overtime in the case captioned *Bollinger et al. v. Residential Capital, LLC et al.*, Civ No. 2:10-01123 (RSM), currently pending in the United States District Court for the Western District of Washington. Cause exists under § 362(d)(1) in light of the advanced stages of the litigation, the extensive knowledge and experience of the trial court, and the negligible burden on the debtors in proceeding through trial.

This motion is based on the memorandum of points and authorities filed herewith, the declaration of Robert L. Schug and exhibits thereto, the records on file in this action, and such other evidence and oral argument as will be permitted by the Court. The proposed order is attached hereto.

Dated: July 3, 2012
San Francisco, California

Respectfully Submitted,

NICHOLS KASTER, LLP

/s/ Robert L. Schug

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*(*pro hac vice* application pending)

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